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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SHIREHAMPTON DRIVE TRUST,
Plaintiff,

v.

JPMORGAN CHASE BANK, NATIONAL
ASSOCIATION; MTC FINANCIAL INC.
DBA TRUSTEE CORPS; and LOUISA
OAKENELL,
Defendants.

CASE NO.: 2:16-cv-02276-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINES TO FILE
SUPPLEMENTAL BRIEFS
RE: NOVEMBER 19, 2021 STATUS
HEARING**

(First Request)

JPMORGAN CHASE BANK, N.A.,
Counterclaimant,

v.

SHIREHAMPTON DRIVE TRUST; DOES
1 through 10, inclusive; and ROE
CORPORATIONS 1 through 10, inclusive,
Counterdefendants.

Plaintiff Shirehampton Drive Trust (“Plaintiff”) and Defendants JPMorgan Chase Bank,
N.A. (“Chase”), by and through their respective counsel of record, hereby agree as follows:

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1 1. On November 19, 2022, the Court held a status hearing regarding this matter in
 2 light the Memorandum entered by the Ninth Circuit Court of Appeals in Case No. 19-17253 on
 3 October 18, 2020 (Docket No. 70).

4 2. After discussion at the status hearing, the Court directed Plaintiff and Chase to
 5 submit supplemental briefs to address certain issues raised by the Ninth Circuit's Memorandum.
 6

7 3. Plaintiff's counsel submitted his brief on December 20, 2021(Docket No. 78),
 8 but the undersigned counsel for Chase inadvertently (and, apparently, incorrectly) believed that
 9 the briefing would be sequential (with Chase's response brief to be filed on January 10, 2022,
 10 and Plaintiff's reply (if any) to be filed on January 24, 2022).
 11

12 4. The undersigned Counsel have discussed this situation, and respectfully ask this
 13 Court to extend/modify the briefing deadlines and protocol arising from the November 19, 2021
 14 status hearing as follows:

- 15 (i) Chase's initial brief (and its opposition to Plaintiff's December 20, 2021 brief
- 16 (Docket No. 78)) shall be due on Monday, January 10, 2022;
- 17 (ii) Plaintiff's opposition to Chase's initial brief (and its reply, if any, relative to
- 18 Plaintiff's December 20, 2021 brief) shall be due on Monday, January 31, 2022;
- 19 and,
- 20 (iii) any reply of Chase (if any) shall be due no later than Monday, February 14,
- 21 2022.
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5. The parties respectfully submit that the instant stipulation (and the extension set forth herein) is not requested for purposes of delay, but is submitted in good faith to address an inadvertent error in this matter and to allow the parties to orderly brief the issues before the Court.

Dated this 3rd day of January, 2022.

Dated this 3rd day of January, 2022.

SMITH LARSEN & WIXOM

LAW OFFICES OF MICHAEL F. BOHN,
ESQ., LTD.

/s/ Kent F. Larsen

/s/ Michael F. Bohn

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE

JUDGE DATED: January 3, 2022.